



Fact Sheet on the Draft Environmental Cooperative Agreement between Packaging Corporation of America and Wisconsin Department of Natural Resources

Following a Public Comment Period, the Wisconsin Department of Natural Resources (DNR), will determine whether to issue and enter into an Environmental Cooperative Agreement (Agreement) with Packaging Corporation of America (PCA). This Agreement was developed under Wisconsin's Environmental Cooperation Pilot Program pursuant to Section 299.80, Wis. Statutes.

Facility Background

Packaging Corporation of America, headquartered in Lake Forest, Illinois, owns and operates a stand-alone, semi-chemical, integrated pulp and paper mill located at N9090 County Road E in Tomahawk, Wisconsin. The Tomahawk mill manufactures over one-half million tons of corrugating medium that is utilized in the containerboard industry. The mill, built in 1920 by the Pride Pulp and Paper Company, originally manufactured kraft paper. The mill discontinued kraft pulping in 1953 when it switched to semi-chemical pulping. The mill and its ancillary operations occupy approximately 400 acres. The facility employs 450 people, which makes it the largest manufacturing employer in Lincoln County. The Tomahawk facility operates an onsite state-of-the-art anaerobic wastewater treatment plant.

PCA has been a leader in waste minimization and pollution prevention activities for many years, winning numerous awards including the:

- WI Governor's Award – Hazardous Waste Reduction (1995)
- WI Governor's Award – Waste Reduction and Recycling (1996)
- Prevention/Environment/Prosperity Award (1997)
- Keep America Beautiful, Inc. National Award for Environmental Educational Initiative (1998)

- National Environmental Education & Training Foundation Award (1998)
- Tenneco Corporation Environmental Innovation Award (1998)
- WI Manufacturer's & Commerce Business Friend of the Environment Award (1998)
- WI Association for Mid-Level Education Environmental Education Award (1998)
- American Forest & Paper Association National Water Quality Management Award (1999)
- American Forest & Paper Association National Air Quality Management Award (2000)
- WI Manufacturer's & Commerce Business Friend of the Environment Award (2001)

Agreement Summary and Variances

On April 16, 1998 U.S. EPA promulgated 40 CFR Part 63 Subpart S (also called MACT I). The rule requires that semi-chemical pulp mills, including PCA, follow an EPA technology prescription that involves the collection and incineration of exhaust gases from pulp mill process sources thereby maximizing the control of hazardous air pollutants, particularly methanol. During project implementation, PCA identified an alternative control approach involving the collection and biotreatment of select pulp mill condensates. Research performed at the University of Wisconsin – Madison determined that this alternative strategy could achieve a significant improvement in methanol control efficiency.

PCA presented this alternative compliance proposal to both the DNR and U.S. EPA Region V. Specifically, PCA proposed that, in lieu of following the promulgated MACT I protocol, select condensates produced by pulp mill indirect contact condensers would be hardpiped to the facility wastewater treatment plant for biodegradation. The Agencies identified the Cooperative Environmental Agreement process as the optimal means of implementing the alternative control technology proposal.

In addition to the alternative MACT I technology proposal, this Agreement modifies the ceiling concentration for carbon monoxide emissions from one of PCA's solid fuel boilers in an effort to reduce fossil fuel usage and maximize biomass fuel usage.

Commitments in the Agreement

Under this agreement PCA is specifically committing to:

- Double the level of control of methanol releases from pulp mill sources over and above what would have been achieved under the MACT I rule, as promulgated.
- Maximize the use of biomass fuel.
- Develop an environmental management system designed to continuously improve the facility's environmental performance by establishing discrete environmental goals and performance objectives.
- Evaluate water treatment methods designed to minimize phosphorus discharges.
- Increase employee/community understanding of the facility's environmental objectives and performance.

For more information:

Go to the Bureau of Cooperative Environmental Assistance website at: <http://www.dnr.state.wi.us/org/caer/cea/ecpp/>. Or contact Laurel Sukup at: (715) 365-8936 or e-mail Laurel.Sukup@dnr.state.wi.us.